

TURNER CONSTRUCTION COMPANY SCBU					
SUBSTANCE ABUSE POLICY	SEC 2, DOC 21	APPROVED BY D.McGee	DATE 6.22.12	REV. # 3	PAGES 1-6

Position Statement On Substance Abuse

TURNER CONSTRUCTION COMPANY has a responsibility to provide a safe and productive workplace for all its employees and subcontractors (and their subcontractors); and a responsibility to the general public and our associates, to ensure that their safety and well-being is protected. A substance abuse policy has been established to provide Turner Construction Company with a means to meet these responsibilities.

NOTE: In this policy, the term "substance abuse" is used to mean the use/abuse of or dependency on illegal drugs, alcohol, or drugs that can be prescribed legally but are used in a manner inconsistent with the prescription. Employees are required to notify their supervisor if taking any prescription medications before starting work.

The Substance Abuse Policy includes consideration for the following types of testing: pre-placement, post-accident, aberrant behavior, during routine medical procedures, for reasonable cause, and random testing.

A third party administrator will conduct this program in a strictly confidential manner. Your cooperation and support will make Turner Construction Company a better place to work.

SUBSTANCE ABUSE POLICY

While TURNER CONSTRUCTION COMPANY (the Company), has always strived to provide the safest possible work environment for employees, the growing problem of substance abuse (drugs and alcohol) within society in general, and the work environment in particular, necessitates the adoption of a written Substance Abuse Program. A high percentage of all work related accidents could be attributed to substance abuse. Therefore, effective immediately, our long-standing policy prohibiting the use or influence of drugs or alcohol, or the presence of their metabolites in an employee, on a jobsite, on Company property or while conducting Company business will be reinforced and directed by this policy statement.

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NOTE: 1) All employees of Turner Construction Company, sub contractors (and their sub contractors), consultants and vendors shall read, understand, and abide by the contents of this policy. 2) This substance abuse policy will not apply to Turner CM jobsites unless specifically requested by the client(s) and approved by Business Unit management.

*Do not bring drugs or alcohol to the workplace. The possession or sale of drugs and/or alcohol within the Company's properties, vehicles, offices, and surrounding areas (e.g. yards, parking lots, etc.) will be grounds for immediate termination and legal authorities will be notified. Prescription drugs are excluded from coverage by this paragraph only if a current authorized prescription from a physician is in effect and available to the Company. Over-the-counter drugs are not covered by this section.

*Do not use drugs or alcohol if they (or their metabolites) will still be in your system while you are at work. The use of alcohol or drugs at any time, such that it could adversely affect the safe performance of your job, will be grounds for disciplinary action. If you are taking a prescription or over-the-counter drug, you are personally responsible for confirming with your physician that you may safely perform any job duties while taking such items. If you are taking a legal substance that could impair your safe work, you must advise your immediate supervisor, who may assign you to non-hazardous duties or send you home. The Company expects every employee to report to work without alcohol or drugs in their system, and to remain that way while at work.

Employees are warned that some drugs, especially marijuana, remain in the system for extended periods. Use of such drugs, even away from the workplace, may lead to a violation of this policy. Applicants and employees should also be aware that certain over the counter consumable products (i.e. hemp products), may cause a substance abuse screen to have a positive result, and that the use of such products is not a medically valid reason for a positive substance abuse screen.

TESTING PROGRAM

An integral part of this Substance Abuse Policy will be testing for all Turner Employees, subcontractors and their subcontractors. Saliva, Breath or Urinalysis will be used as the method(s) of determining the presence or absence of alcohol or drugs in a person's body. Testing will be required for pre-placement, for cause, on a random basis, and otherwise as described herein.

Samples for pre-placement, random, and other testing shall be submitted immediately on request. Substance abuse testing and time required for testing for

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Turner Construction Company employees will be paid for by the Company. Sub contractors (and their sub contractors), vendors and consultants will be financially responsible for all costs associated with drug screening for their employees. The Company, for whom the worker is assigned to, will arrange for transportation for testing purposes. Any employee who refuses to be tested will be removed from the site. Any employee who tests non-negative will be removed from site.

Employees are required to produce a valid urine specimen at the collection facility. A valid urine specimen is considered to be free of adulterants or additives, and meet laboratory guidelines for specific gravity and creatinine levels and be considered acceptable for full test sensitivity.

Any person tested under this policy will have the opportunity, in a confidential setting, to provide information that may be relevant to the results of the test, including identification of currently or recently used prescription or non-prescription drugs or other relevant medical information. Tested individuals have a right, on request, to obtain the written test results.

SUBSTANCES COVERED BY THE TESTING PROGRAM

The Company's testing program will determine the presence of any or all of the following substances and their metabolites in the body: amphetamines, cannabinoids, cocaine, opiates, and phencyclidine. The Company is concerned about the abuse of prescribed and over-the-counter medication as well as illegal drugs and alcohol. Consequently, the testing program and covered substances may be modified to reflect changes in drug issues.

PRE-PLACEMENT TESTING

All prospective employees (Turner and all Turner subcontractors) will be tested for the presence of drugs, and their metabolites in order to be eligible for employment. Positive results, for other than verified prescriptions for the applicant, will be grounds for rejection. All screens are processed through Turner Construction Company's vendor for substance abuse screening no more than two (2) weeks prior to the start of the individual employee's work.

RANDOM TESTING

Random testing may be imposed on any employee at any time. This testing process is necessary to protect the safety of all employees and to assure the integrity of this policy and to comply with statutory regulations where they apply.

FOR CAUSE TESTING

Tests for drugs, alcohol, and their metabolites will be required when:

- An employee's behavior is out of character or matches an accepted profile of being under the influence of alcohol or drugs.

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- An employee is subject to an injury requiring medical attention.
- An employee has been involved in a vehicular accident on company time or in a Company vehicle.
- All testing FOR CAUSE will occur immediately or as soon as reasonably possible after the incident requiring it, taking into consideration the health and well being of the effected individual(s).
- An employee being tested FOR CAUSE may be suspended pending the test results.

Employees in this situation are considered potentially impaired and will be treated accordingly. Employees obviously affected by any substance will not be allowed to operate a motor vehicle. Safe transportation will be arranged by the potentially impaired employee's employer. Employees refusing this arrangement will be immediately reported to the local law enforcement authorities.

OTHER TESTING

The Company reserves the right to test Turner and all subcontractor employees subject to this policy for reasons other than those listed above, such as; annually as a Company wide process, medical reasons, decline in overall safety performance, high accident rate in specific crews, specific accusations, when performing certain tasks, or other reasonable considerations.

Laboratory Testing Procedures

Procedures for sample collection, storage and transportation of specimens are specifically followed to prevent the possibility of contamination, adulteration or misidentification. Because of the consequences of a non-negative test results on employees, the Company will employ an accurate testing procedure. Collections will be performed under reasonable and sanitary conditions. Labeling of specimens and internal chain of custody procedures shall be practiced. On-site screens that test non-negative will be confirmed by a qualified and certified, federally approved, state approved, and Substance Abuse and Mental Health Services Administration (SAMSHA), approved laboratory. All laboratory procedures are performed in accordance with scientifically accepted analytical methods and procedures. It could take up to 72 hours, but usually 24 hours or less, for the specimen to finish the confirmation process. A final determination will be made only after the Gas Chromatography/Mass Spectrometry (GC/MS) process is complete. Since the substance abuse screening program is first and foremost a safety program, the 'pending' individual will not be allowed on-site until this process is complete. Once the final determination has been made, the General Contractor (and sub contractor, if applicable), will be notified by third party administrator.

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RETESTING

Applicants or employees who test positive for drugs or alcohol, and who believe the test results are incorrect, may request a retest of the original specimen at his/her own cost. The retest will be performed by an equally qualified laboratory. If the retest is negative, a third testing of the original specimen will be done by a third laboratory to confirm or deny the previous test results. A toxicologist will be available to review all data for a final determination. Portions of the original specimen are available for two years at the laboratory where the sample was originally analyzed.

Voluntary Assistance

Any employee who has a problem with drug or alcohol abuse is encouraged to come forward prior to being tested. Since substance abuse is a major element in the cause of accidents, the Company cannot allow employees to work with the presence of, or potential influence of illegal substances, certain prescription medications, or alcohol. The merits of each case will dictate any actions taken. Employees who come forward may be given the opportunity to participate in a substance abuse rehabilitation program. Any employees who test positive will be subject to disciplinary actions and/or terminated. Employees retained, or reinstated will be subject to increased testing outside of the specifications in this policy, and will be required to sign an agreement to that effect upon return to work status. No guarantee to position, title, compensation or benefits is guaranteed.

Other

TRAINING

Training of individual managers, supervisors, and employees is the responsibility of the sub contractors, consultants, and vendors. It is also the responsibility of the sub contractors, consultants, and vendors to assure that each of their employees understands this policy and all of its conditions and requirements.

SEARCH

The Company's management and its agents have the right to search its offices, jobsites, and surrounding areas for drugs and alcohol. Any vehicle, lunch box, and other possessions brought onto Company property or areas are subject to search.

CONFIDENTIALITY

All employee information relative to this program is confidential and will be maintained accordingly by the third party administrator and the Company.

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Questions or concerns regarding substance abuse screens collected under this policy must be addressed within 1 calendar year from the date of collection.

QUESTIONS

If you have questions concerning this policy, please discuss them with your supervisor. An outside consultant is also available to discuss the policy with you; contact the Company for the third party administrator contact information. It is the responsibility of every employee to understand and abide by this policy.

POLICY REVISIONS

The Company reserves the right to modify this policy as needed to meet the requirements of our employees, the Company and statutory rules or laws. All employees, sub contractors, vendors and consultants will be informed of such changes in a timely manner.